

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

**COURT FILE NO.: 1:17-cv-01869-SJ-RML**

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MIKHAIL USHER  
USHER LAW GROUP, P.C.

Plaintiffs,

v.

SHORE FUNDING SOLUTIONS INC.

Defendants.

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**PLAINTIFF'S MOTION TO  
COMPEL PRODUCTION &  
EXTEND DISCOVERY END DATE**

Pusuant to Federal Rule of Civil Procedure 37, Plaintiffs Mikhail Usher and Usher Law Group, P.C., through undersigned counsel, respectfully move for an order compelling Defendant Shore Funding Solutions, Inc., to produce materials responsive to Plaintiffs' Interrogatories and Document Requests, additionally an extension of time to complete discovery.

WHEREFORE, Plaintiffs request that the Court order Defendant SHORE FUNDING SOLUTIONS to produce materials responsive to Plaintiffs' Interrogatories and Document Requests within **two** calendar days of the entry of the Order on this Motion, and to award costs incurred by Plaintiffs in bringing this motion including attorney's fees.

Dated: January 26, 2018

Respectfully Submitted,

/s/ Nicholas Sarta

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